

UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

IN RE
JUAN C. PRADO NICASIO
SSN #3397
Debtor

JUAN CARLOS PRADO NICASIO
Plaintiff

vs

DIONISIO BENÍTEZ RODRÍGUEZ a/k/a
d/b/a FERRETERÍA MONTALVO,
FERRETERÍA MONTALVO INC.
MARILIN PRADO NICASIO
BANCO POPULAR DE PUERTO RICO

Defendants

BANKRUPTCY 19-06224 MCF

CHAPTER 13

ADVERSARY NO. 19-00462

MOTION TO INFORM RULE 2004 PRODUCTION HAS BEEN ANSWERED
BY CO-DEFENDANT DIONISIO BENITEZ RODRIGUEZ

TO THE HONORABLE COURT:

COMES NOW co-defendant Dionisio Benitez Rodríguez, who respectfully informs this Court of his Answer to Rule 2004 Production served on him by Plaintiff, as follows:

1. On January 12, 2021, Plaintiff through his counsel served co-defendant with a Rule 2004 Production. Refer to doc #45.
2. Although we had held back in answering the Rule 2004 Production in waiting for our Rule 2004 Production served on debtor since December 6, 2019, to be answered first, we now have under the circumstances of undue and unreasonable delay in answering our Production, reconsidered and today have proceeded to respond, notwithstanding our still pending Answer to our Production. Refer to doc #19 in the legal bankruptcy case 19-06224.
3. On this same date, we have submitted our Answer to Plaintiff through his counsel.
4. On this same date, we have also once again followed up on the partially unanswered Rule 2004 Production served on debtor 16 months ago via letter once again detailing what little has been

received from debtor and with more detail, what has not been received from the Rule 2004 Production.

WHEREFORE, co-defendant herein informs his Answer to Rule 2004 Production and further informs that his Rule 2004 remains unanswered and incomplete.

CERTIFICATION OF PERSONAL SERVICE

On this same date of April 2, 2021, I have filed this motion with the Court and on information and belief the CmEcf electronic noticing system will electronically notice a copy of the same to the debtor through his counsel, Ms. Ada M. Conde, Esq. at 1611lawandjustice@gmail.com , counsel for plaintiff and other participants of CmEcf.

In Caguas, Puerto Rico, this April 2, 2021

s/*LA Morales*

LYSSETTE A MORALES VIDAL
USDC PR #120011

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For co-defendant Dionisio Benítez Rodríguez